

United States District Court
Eastern District of Wisconsin

Brown v. City of Milwaukee
18 CV 922



Video Deposition of
Paul Kavanagh - Rule 30(b)(6)
Recorded 05/24/2019 in Milwaukee, WI
9:14 am - 4:07 pm, 298 mins. elapsed

Magne-Script

(414) 352-5450

22372 Standard transcript with Index

Witness

Paul Kavanagh - Rule 30(b)(6)

Friday 05/24/2019 at 09:00 by: Jeff Joseph

Milwaukee City Attorneys Office

841 N. Broadway #716

Milwaukee, WI 53202

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A P P E A R A N C E S

Mark L. Thomsen and Scott B. Thompson
Gingras, Cates & Wachs
3228 Turnberry Oak Dr. #210
Waukesha, WI 53188
On behalf of the Plaintiff

Naomi E. Gehling
Milwaukee City Attorneys Office
841 N. Broadway #716
Milwaukee, WI 53202
On behalf of the Defendants

1 you were going to discuss: discipline related to these
2 officers relating to -- and including relating to Mr.
3 Brown, correct?

4 A Yes.

5 Q And then the other is any discipline, if any, of any
6 Milwaukee police officer for any race-based conduct
7 from 2008 to the present, correct?

8 A Yes. That's number 6.

9 Q On Exhibits 55 and 56, what documents included in
10 Exhibits 55 and 56 were in any way instructive or
11 related to the topic of any discipline, if any, of any
12 Milwaukee police officer for any race-based conduct
13 from 2008 to the present?

14 A Sergeant Michelle Pagan, who works at Internal Affairs
15 in mostly an administrative capacity -- has been there
16 for years -- did a search. She was unable to find any
17 of those type of cases going back for that time frame.

18 Q Okay. So my initial question was related as to
19 Exhibits 55 and 56, so it sounds like there are no
20 documents on Exhibit 55 or 56 that relate in any way
21 to any race-based conduct; is that correct?

22 A Correct.

23 Q And then you said separately that Sergeant Michelle
24 Pagan...

25 A Yes.

1 Q ...conducted a search of the department's and IAD's
2 records from 2008 to the present, correct?

3 A Yes.

4 Q And determined that there were no instances of any
5 race-based discipline during that some 11 [year]
6 period of time, correct?

7 MS. GEHLING: Objection. Vague.

8 A As I understand it, yes.

9 BY MR. THOMSEN:

10 Q And I'm going to show you what has been marked as
11 Exhibit 57. Have you ever seen that?

12 A I may have. I'm not certain.

13 Q Take a minute and look at it and read it and tell me
14 what it is, if you can.

15 (Exhibit 57 identified)

16 A Okay. It's a report run on December 19th of last
17 year, Milwaukee Police Department discipline of
18 officers for race-based conduct. And there are a
19 total of four cases here.

20 Q It was my understanding that you would, on behalf of
21 the city, be in a position to tell me about Exhibit
22 57. What can you tell me about it?

23 A I was unaware of this and I'm unaware of these cases,
24 so I'm not prepared to speak on them.

25 MR. THOMSEN: Counsel, are you going to give